

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NEXSTEP, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 19-1031 (RGA)(SRF)
)	
COMCAST CABLE)	REDACTED - PUBLIC VERSION
COMMUNICATIONS, LLC)	Original filing date: August 27, 2021
)	Redacted filing date: September 8, 2021
Defendant.)	
)	
)	

**DECLARATION OF HEATHER A. FALTIN IN SUPPORT OF COMCAST CABLE
COMMUNICATIONS, LLC'S REQUEST TO SEAL CERTAIN INFORMATION IN
THE AUGUST 20, 2021 REPORT AND RECOMMENDATIONS**

I, Heather A. Faltin, hereby declare the following:

1. I have worked at Comcast for the past 10 years. My current position is Vice President and Senior Deputy General Counsel – Patents.
2. I submit this declaration in support of Comcast's request to seal certain information that contained the August 20, 2021 Report and Recommendations. I have personal knowledge of the matters set forth below. If called as a witness, I could and would competently testify as follows.
3. On pages 53-54, footnote 14, the Report and Recommendations recites the amounts of eight license agreements entered into between Comcast and various parties. Comcast seeks to seal the recital of the amount of each license.
4. By their own terms, the agreements are subject to strict confidentiality provisions and are confidential to both Comcast and the other parties to the agreements. Comcast has not publicly disclosed the terms of these agreements to others. Comcast limits access to these agreements only to the limited number of employees who have a need to know their terms. Comcast does not keep these documents on a shared drive or anywhere else on Comcast's servers where employees that do not have a strict need to know could gain access to them.
5. Disclosure of the terms of these agreements would cause both Comcast and the other parties to these agreements significant competitive harm in several respects. The other parties to these agreements entered into them with the understanding that these terms would be kept confidential, as shown by the agreements' confidentiality provisions. The amounts of the licenses are confidential to both Comcast and these parties, and could affect other licensing discussions by either Comcast or these parties.

6. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: August 27, 2021

By: 

Heather A. Faltin

CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on August 27, 2021, upon the following in the manner indicated:

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/s/ Brian P. Egan

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